

EXHIBIT 125

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE :
4 UNITED STATES VIRGIN :
ISLANDS, : CASE NO.
5 Plaintiff, : 1:22-CV-10904
: -JSR

6 v. :

7 JPMORGAN CHASE BANK, :
N.A., :
8 Defendant/Third Party :
Plaintiff. :

9 JPMORGAN CHASE BANK, :
10 N.A., :

11 Third Party Plaintiff, :

12 v. :

13 JAMES EDWARD STALEY, :

14 Third Party Defendant. :

15 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
VOLUME II

16 - - -
17 July 6, 2023
18 - - -

19 Continued videotaped deposition of
20 MARY CASEY, taken pursuant to notice, was
21 held remotely via Zoom Videoconference
22 beginning at 2:07 p.m., on the above
date, before Michelle L. Gray, a
Registered Professional Reporter,
Certified Shorthand Reporter, Certified
Realtime Reporter, and Notary Public.

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1 that way?

2 A. She wasn't comfortable with
3 him.

4 Q. Because of the conviction in
5 Florida?

6 A. Correct.

7 Q. Did you ever ask her why she
8 continued to approve his due diligence
9 reports?

10 A. No. But I -- so I didn't
11 ask her specifically why she would
12 approve them. But, again, as I had taken
13 the reasonable steps as part of the same
14 policy, she's subject to the same policy.
15 She would also be taking reasonable steps
16 to be comfortable with the sponsorships,
17 since she's signing it as well. Those
18 reasonable steps would include
19 conversations, particularly with
20 Mr. Staley, who knew Mr. Epstein best.

21 Q. But, again, all you can
22 remember Mr. Staley saying to you, at
23 least, was that he felt Mr. Epstein
24 should remain a client of the Private

1 They were part of what would bring the
2 due diligence reports together. So they
3 were part of the due diligence process.

4 I don't know about, when you
5 say "discuss," I'm not sure if you mean
6 discuss, like, we did have meetings about
7 him, et cetera.

8 Q. So when you are -- I'm just
9 speaking now about --

10 A. Yeah.

11 Q. -- the due diligence that
12 you did to form the judgment that the
13 appropriate thing to do with respect to
14 Mr. Epstein is to approve his due
15 diligence report.

16 A. Mm-hmm.

17 Q. Did you discuss that issue
18 with the compliance group?

19 A. So in our -- part of how I
20 formed my reasonable judgment to approve
21 the DDRs as part of the sponsorship
22 policy, I would call upon or, if you
23 will, part of my diligence was escalating
24 and participating in brisk discussions

1 with senior management, compliance
2 included in that, about his relationship
3 with the firm. That was part of what I
4 consider reasonable steps to then be able
5 to approve a DDR, based on the
6 sponsorship policy.

7 Q. And aside from compliance
8 and legal, who else are you including in
9 your definition of senior management?

10 A. So my definition of senior
11 management would be both my chain of
12 management, if you will, my boss up to
13 the head of the Private Bank. And it
14 would also include Mr. Staley, who
15 sometimes was my direct line and
16 sometimes was not, when he moved to the
17 investment bank. But he would be part of
18 those discussions as well and part of the
19 diligence I would do.

20 Q. And when you say -- I forget
21 whether you used -- I think the word
22 "direct line" --

23 A. Yes.

24 Q. You used direct line.